

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually and on behalf of all others similarly situated,

Plaintiff,
v.

IBAN GLOBAL LLC

and

LIVEFREE EMERGENCY RESPONSE,
INC. D/B/A LIFEBEACON

Case No. 24-4212

JURY TRIAL DEMANDED

Defendants.

UNOPPOSED MOTION FOR EXTENSION OF TIME

The Plaintiff, Leon Weingrad, respectfully moves for a two week extension, up to and including July 14, 2025, to respond to Defendant LiveFree Emergency Response, Inc.'s Motion to Dismiss. As reason therefor, the Plaintiff notes that on June 23, 2025, the Court granted the Plaintiff's motion to compel, and ordered production of the documents Plaintiff requested by June 30, 2025, the day the motion is due. Plaintiff requires the additional time to review the Defendant's production and appropriately respond to Defendant's motion. Defendant does not oppose the requested relief.

RESPECTFULLY SUBMITTED AND DATED this June 27, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this June 27, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.